

Category Report

Labelling

This category holds 5% of the overall Index score.

By providing comprehensive and easily understandable information about the nutritional composition and potential health impact of their products through labelling – both on-pack and online – companies can help consumers choose the right products to contribute to healthy diets. As many back-of-pack (BOP) label elements and health and nutrition claims are regulated in India, Category F assesses practices on front-of-pack (FOP) labels, online information, and other ways of providing reliable and clear information to consumers.

To perform well in this category, companies should:

- Provide clear nutritional information for key nutrients on the front of pack (FOP); at a minimum showing % Recommended Dietary Allowance (RDA, or similar measure) for key nutrients;
- Display online nutrition information for products sold online to an equal or greater extent than that found on the physical product., ideally for all products in their portfolio, and through both product images and nutritional information tables;
- Support consumers in finding healthier varieties (as defined by an internationally-recognized or -aligned NPM, government endorsed when available and applicable) of their products through use of a dedicated section, webpage or filter function on their online domain.





Labelling

Category context

Considering the rapidly increasing consumption of processed foods in India, especially those high in fat, salt, and sugar (HFSS),^{126,127} providing clear nutritional information on packs is crucial for helping consumers make informed and health-conscious purchasing decisions, thereby improving diets and reducing the prevalence of obesity and diet-related diseases.

On-pack labelling

In recent years, the Indian government has taken important steps towards developing a system for clear and standardized nutritional information on packs. The 2011 Food Safety and Standards (Packaging and Labelling) Regulations, and the subsequent Food Safety and Standards (Labelling and Display) Regulations, 2020, by Food Safety Standards Authority of India,¹²⁸ include mandatory requirements for BOP labelling: listing nutrients per 100g/ml of the product and listing the percentage contribution to RDA, as well as the requirement to provide information on energy value (kcal), amounts of: protein, carbohydrate, total sugars, added sugars, total fat, saturated fat, trans fat, and cholesterol. There is currently no requirement for fibre or sodium levels.

In addition, in 2018 the FSSAI published draft regulations for FOP nutrition labelling.¹²⁹ After thorough consultation and revisions, in 2022, a subsequent amendment to the regulations proposed the 'Indian Nutrition Rating' (INR) for FOP nutritional labelling. Based on the Health Star Rating System (HSR), the INR system calculates a score for the overall nutritional profile of a product (based on compensatory levels of both negative and positive nutrients), which is then displayed in an interpretive format from ½ star (least healthy) to 5 stars (healthiest). This regulation is expected to be voluntary for 48-months from the date of final notification of the regulation, after which it would move to a mandatory footing.¹³⁰ However, at the time of writing, the regulation is yet to come into effect, and is in part dependent on the FSSAI finalizing a definition for HFSS foods.

The proposed INR amendment for the INR follows successful implementation of other FOP labels by at least 32 governments worldwide since 1989, including: the HSR System in New Zealand and Australia (2014), Warning Labels in Chile (2016) the Traffic Light label in the UK (2017), the Dutch Wheel of Five (2017), the Nutri-Score in France (2017, and subsequently by other EU countries), among others. The adoption of FOP labelling reflects studies showing that BOP nutrient declarations only play a minor role in consumer's purchasing decisions, as they are often difficult to understand.¹³¹ In contrast, FOP labelling allows for the delivery of simplified and immediately visible nutritional information, especially those referred to as 'interpretive' labels, which use symbols, color coding, or words to convey an evaluative judgement on the nutritional quality of a product. When such systems are mandatory, it further stimulates competition between companies on the basis of product healthiness, which can therefore accelerate the rate of reformulation and improve the healthiness of the overall supply of packaged foods and beverages.

Nutrition and health claims and on-pack logos

The Food Safety and Standards (Advertising and Claims) Regulations, 2018, sets out that all products fortified according to these regulations must use the +F logo on their labels. The F+ logo is intended to help consumers easily identify fortified products, thereby helping improve the overall nutrition of the



population in India. For regulation on health claims, the FSSAI regulation Food Safety and Standards (Advertising and Claims) Regulations, 2018 sets guidelines to ensure that health claims are truthful, based on scientific evidence, and are not misleading.

Box F1. Changes to the methodology

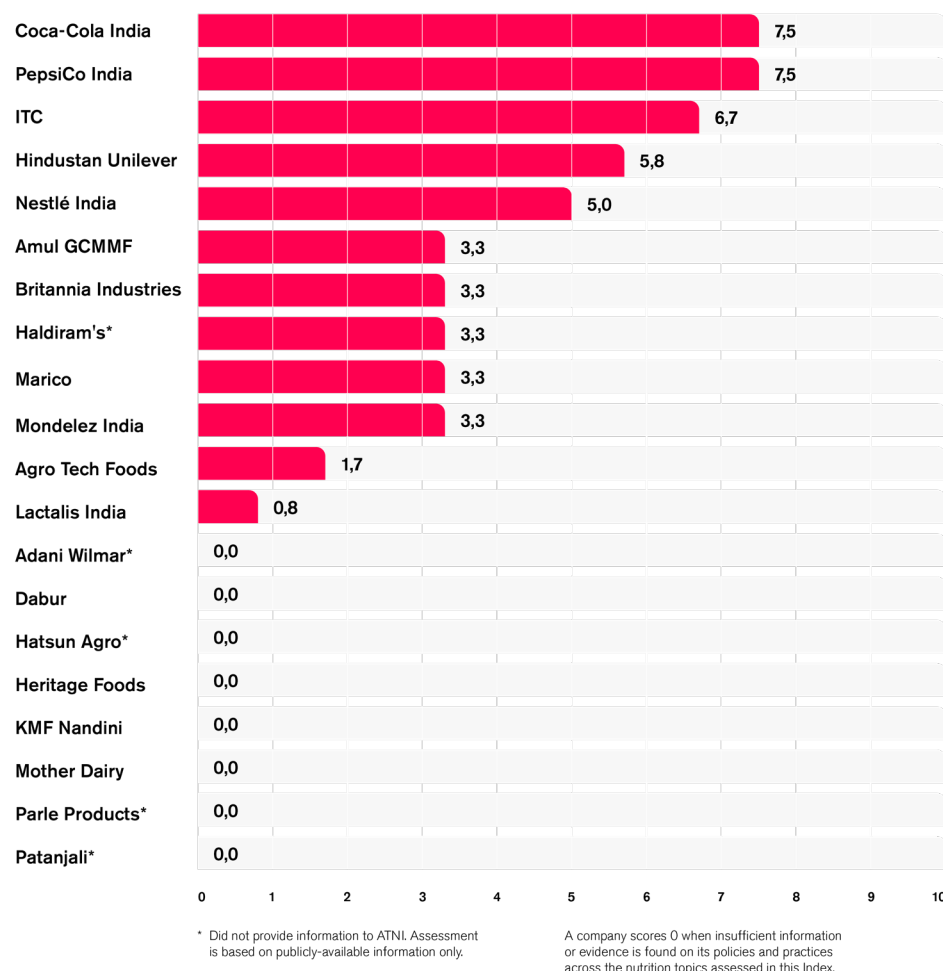
This category was substantially revised from the previous 2020 India Index, with the number of indicators reduced from 10 to 3 — mostly because of the new regulations in place as ATNI does not test compliance with regulation (such as for nutrition and health claims). Indicators crediting broad ‘commitments’ to provide nutritional information labelling have been removed, and replaced with a simplified focus on what labelling the company has currently in place, and whether this is consistent to what is displayed on their web domain. A new indicator has been added to assess whether companies makes it easier to find ‘healthier’ varieties on their website.

See full methodology [here](#).



Company ranking

Figure F1. Category ranking on Labelling



Coca-Cola India and PepsiCo India are the joint highest-scoring companies for this category with a total score of 7.5 out of 10, followed by ITC with a score of 6.7.

Key findings

- Only six companies were found to currently provide nutritional information on FOP: Coca-Cola India, Hindustan Unilever, ITC, Mondelez India, Nestlé India, PepsiCo India, with all doing so in a numerical format for key nutrients.
- Companies made clear that they are waiting for the FSSAI to finalize and approve the INR FOP labelling system before introducing any new FOP labelling, to avoid confusing consumers and wasting resources changing packaging designs.
- Twelve companies display nutritional information online on their public domain, although there is significant variation as to how this information is displayed, how comprehensive and clear the information is, and how widespread across their portfolio the information is.
- Few companies generally have features in place on their website to guide external parties to find healthier varieties on their website. Of the five that have some kind of feature, four use their internal NPM to determine what products were considered 'healthy' for this purpose, however none of these were aligned with an internationally recognized NPM.



Detailed findings

Do companies provide nutritional information on their front-of-pack label?

In total, six companies state that they provide nutritional information on their front-of-pack (FOP) label: : Coca-Cola India, Hindustan Unilever, ITC, Mondelēz India, Nestlé India and PepsiCo India. Each company displays numeric information only, including the percentage of RDA for their whole portfolio, with the exception of Nestlé India and ITC, which only do so for select product ranges. ITC stated that they provide FOP info for 'select products like Farmlite oats almond, Aashirvaad vermicelli, Aashirvaad multigrain flour, and Ready-To-Cook chapatti', and Nestlé state that they only currently provide FOP guidance for 'children (4-12 years) and family products'

No assessed companies use an interpretative FOP labelling system. It is clear that many companies are waiting for a regulatory decision to inform them how they should proceed. Stated reasons given by companies for delaying action on FOP interpretative labelling until after an FSSAI decision include wanting to avoid confusing consumers, and to avoid incurring extra costs from changing packaging designs twice. This situation highlights the importance of policymakers being proactive in driving progress through clear and timely regulation – as companies are waiting for government action.

Hindustan Unilever drew attention to its 'Responsibly Made for Kids' logo found on their 'Kwality Wall's' kids range of ice cream, which the company stated was underpinned by their internal nutrient profiling system –the Unilever Science-based Nutrition Criteria (USNC). ATNI's product portfolio assessment applying the WHO SEAR criteria on marketing to children found the ice cream products included were not found eligible for marketing to children. It is important that companies ensure that their responsible marketing policies also apply to product labelling to ensure these products are not undermining children's health.

Do companies display nutritional information on their public web domain, and in what form?

With over 50% of the Indian population now having internet access,¹³² companies can utilize their websites to be transparent about the nutritional information available online for their products, and to help consumers identify healthier food and drinks options. Companies can show their product label data comprehensive online by showing high resolution images of FOP and BOP packaging, to ensure label information is as clearly available as in-store. In addition to, or as an alternative to displaying BOP images, companies could also display relevant nutritional information in tabular form, which may include showing information per 100g, per serving size, and % RDA.

Our findings indicate that 12 companies display nutritional information online, although the extent of this information, and the form it takes, varies considerably. Nevertheless, it is encouraging that many companies chose to display both FOP and BOP images, and/or with accompanying tables, which offers consumers and other stakeholders the most comprehensive range of information, as shown in Table F1.



Table F1. How nutritional information is displayed on the companies' web domains

Company	Images of FOP packaging	Images of BOP packaging	Nutritional information table
Agro Tech Foods	-	-	●
Amul GCMMF*	●	-	●
Britannia Industries Ltd	●	-	●
Coca-Cola India	-	-	●
Haldiram's*	●	●	-
Hindustan Unilever	○	○	●
ITC	●	●	●
Lactalis India*	○	-	○
Marico	●	●	●
Mondelēz India	○	-	○
Nestlé India	●	●	●
PepsiCo Inda	●	●	-

● Yes, for all products
 ○ Yes, for some products
 - No/no information

* Did not provide information to ATNI

Note: Information on companies' display of nutritional information online was not found for Adani Wilmar, Dabur, Hatsun Agro, Heritage Foods, KMF Nandini, Mother Dairy, Parle Products, and Patanjali.

Three companies displayed only limited nutritional information online for their whole product portfolios (Agro Tech Foods, Haldiram Foods, and Hindustan Unilever), such as not including ingredients lists as part of information displayed online, product images being too low resolution lacking 'zoom' features to easily read nutritional label information, or the nutritional information not being clearly located on the company's website. For Coca-Cola India, nutritional information is displayed as tables beneath each product, while product packaging images do not appear to show FOP labels on them, despite being shown on the physical products. Furthermore, four companies displayed information via their brand-specific websites. However, nutritional information was often not consistently available across their brand sites. This was the case for Lactalis, for example, with different brand sites Tirumala, Anik, and Prabhat showing varying levels of nutritional information online. For other companies where nutritional information was not directly available on their corporate web domain, this was found on the company's own e-commerce site, as was the case for ITC and their ITC Store site. For direct-to-consumer channels such as the ITC Store site, displaying nutritional information online is a valuable way for companies to enable consumers to make informed purchasing decisions.



Table F2. Where nutritional information is found on company’s web domain

Company	On main company website	On brand-specific sites	On company e-commerce platform
Agro Tech Foods	●	-	-
Amul GCMMF*	●	-	-
Britannia Industries	●	-	-
Coca-Cola India	●	-	-
Haldiram’s*	●	-	-
Hindustan Unilever	●	○	○
ITC	-	-	●
Lactalis India*	-	●	-
Marico	-	●	-
Mondelēz India	-	●	-
Nestlé India	-	-	●
PepsiCo India	●	-	-

● Yes, for all products
 ○ Yes, for some products
 - No/no information

* Did not provide information to ATNI

Note: Information on companies’ display of nutritional information online was not found for Adani Wilmar, Dabur, Hatsun Agro, Heritage Foods, KMF Nandini, Mother Dairy, Parle Products, and Patanjali.

Do companies assist stakeholders with finding healthier products on their website?

Few companies’ websites have options to assist visitors with finding healthier varieties. Four companies — Coca-Cola India, Hindustan Unilever, ITC, and PepsiCo India, — used their own, company-developed NPMs to define “healthier” options (see the [chapter on Nutrient Profiling](#) for more information on company’s NPM’s). Haldiram’s, offers specific product webpages for its ‘healthy snacking’ and ‘sugar free/no added sugar’ ranges, although it is not clear whether these categories are defined by any formal nutrient profiling criteria.

Coca-Cola India was the only company to offer a ‘filter’ function (for ‘Nutrition & Hydration’). Haldiram’s, Hindustan Unilever, and PepsiCo India each had distinct webpages spotlighting examples of ‘healthier’ choices (according to company internal definitions) — though with no way to search or filter across the whole portfolio. ITC referred to the example of the Nutricorner section of its e-retail site, stating that it ‘has product listings based on different nutritional benefits — proteins, micronutrients, immunity & fibre’. However, at the time of writing, this webpage also included products such as chocolate truffles and chocolate milkshakes, which are generally not considered fit for a healthy diet.



Recommendations

In order to be transparent about their products' nutritional quality and support consumers in their dietary choices and guide them towards healthier products, companies are encouraged to:

- Once it is formally enacted by FSSAI, if the INR FOP labeling system is on a voluntary basis, adopt it across their entire portfolios in India.
- Ensure that nutritional information is available for all products on their websites *both* as high-definition images of the FOP and BOP images, and as accompanying tables showing comprehensive product-specific nutritional information.
- Implement features, such as portfolio-wide filter functions, on their websites and/or e-commerce sites to ensure that healthier varieties can be easily identified and located by consumers. These should be classified as 'healthy' according to a government endorsed and internationally recognized NPM.

Recommendation for policymakers

- Government could ensure clear and transparent labelling guidelines are in place that incorporate the definition of highly processed foods and criteria for HFSS thresholds.



¹²⁶ Xiaojia Chen et.al, "Consumption of Ultra-Processed Foods and Health Outcomes: A Systematic Review of Epidemiological Studies," *Nutrition Journal* 19, no. 86 (August 20, 2020), <https://nutritionj.biomedcentral.com/articles/10.1186/s12937-020-00604-1>.

¹²⁷ A. Minhas, "Prevalence of Obesity across India in 2016 and 2021, by Gender" (Statista, July 12, 2023), <https://www.statista.com/statistics/1339281/india-prevalence-of-obesity-by-gender/>.

¹²⁸ "FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020" (FSSAI, 2021), https://www.fssai.gov.in/upload/uploadfiles/files/Compendium_Labelling_Display_23_09_2021.pdf.

¹²⁹ "Notice Calling for Suggestions, Views, Comments Etc from Stakeholders on the Draft Food Safety and Standards (Labelling and Display) Regulations, 2018." (FSSAI, 2018), https://www.fssai.gov.in/upload/uploadfiles/files/Draft_Notice_Comments_Labelling_Display_11_04_2018.pdf.

¹³⁰ "FOOD SAFETY AND STANDARDS AUTHORITY OF INDIA NOTIFICATION," *The Gazette of India*, September 13, 2022, https://fssai.gov.in/upload/uploadfiles/files/Draft_Notification_HFSS_20_09_2022.pdf.

¹³¹ Montserrat Ganderats-Fuentes and Sherry Morgan, "Front-of-Package Nutrition Labeling and Its Impact on Food Industry Practices: A Systematic Review of the Evidence," *Nutrients* 15, no. 11 (June 1, 2023), <https://www.mdpi.com/2072-6643/15/11/2630#B8-nutrients-15-02630>.

¹³² "Internet in India 2022," https://www.iamai.in/sites/default/files/research/Internet%20in%20India%202022_Print%20version.pdf.